



OFFICE OF THE STATE'S ATTORNEY  
COOK COUNTY, ILLINOIS

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August 11, 1999

VIA EXPRESS MAIL

Maggie Roman Salas, Esq.  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

RECEIVED

AUG 12 1999

FCC MAIL ROOM

*RM-9258*

RE: In the Matter of Numbering Resource Optimization  
CC Docket No. 99-200

Dear Ms. Salas:

Enclosed please find an original and nine (9) copies of the Comments on Notice of Proposed Rulemaking and an original and four (4) copies of the Motion for Leave to Submit Late-Filed Comments on Notice of Proposed Rulemaking in the above-entitled docket, both filed on behalf of the Citizens Utility Board, the People of the State of Illinois, the Cook County State's Attorney's Office and the City of Chicago ("Illinois Government and Consumer Intervenors"). Included also are a Notice of Filing and Certificate of Service.

If you have any questions regarding either of these documents, please do not hesitate to contact me.

Sincerely,

David L. Heaton  
Assistant State's Attorney

Enclosures

No. of Copies rec'd 0+3  
List ABCDE

Before the

FEDERAL COMMUNICATIONS COMMISSION

In the Matter of	)	
	)	CC Docket No. 99-200
Numbering Resource Optimization	)	
Connecticut Department of Public Utility	)	
Control Petition for Rulemaking to Amend	)	
The Commission's Rule Prohibiting	)	RM No. 9258
Technology Specific or Service-Service	)	
Area Code Overlays	)	
Massachusetts Department of	)	
Telecommunications and Energy Petition	)	
For Waiver to Implement a Technology-	)	NSD File No. L-99-17
Specific Overlay in the 508, 617, 781 and	)	
978 Area Codes	)	
California Public Utilities Commission	)	
and The People of the State of California	)	
Petition for Waiver to Implement A	)	NSD File No. L-99-36
Technology-Specific or Service-Specific	)	
Area Code	)	

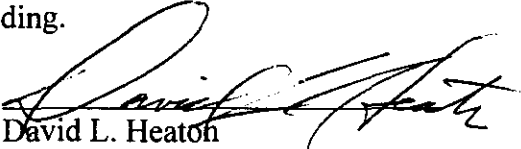
**RECEIVED**

**AUG 12 1999**

**FCC MAIL ROOM**

**NOTICE OF FILING**

PLEASE TAKE NOTICE that we have this 11th day of August filed with the Secretary of the Federal Communications Commission, 445 12<sup>th</sup> Street, S.W., Washington, D.C. 20554, the Comments on Notice of Proposed Rulemaking of the Citizens Utility Board, the People of the State of Illinois, the Cook County State's Attorney's Office and the City of Chicago and the Motion for Leave to Submit Late-Filed Comments on Notice of Proposed Rulemaking of the Citizens Utility Board, the People of the State of Illinois, the Cook County State's Attorney's Office and the City of Chicago, in the above-entitled proceeding.

  
David L. Heaton  
Assistant State's Attorney

STATE OF ILLINOIS )  
 ) SS.  
 )  
COUNTY OF COOK )

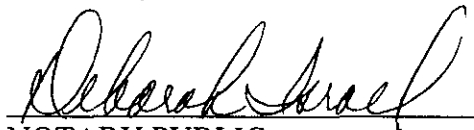
**VERIFICATION**

JANICE A. DALE, being first duly sworn on oath, states that she is an Assistant Attorney General, that she has read the attached Motion for Leave to Submit Late-Filed Comments on Notice of Proposed Rulemaking of the Citizens Utility Board, the People of the State of Illinois, the Cook County State's Attorney's Office and the City of Chicago, and that the facts therein are true to the best of her knowledge, information, and belief.



Janice A. Dale  
Assistant Attorney General

SUBSCRIBED AND SWORN TO  
BEFORE ME THIS 17th DAY OF  
AUGUST, 1999.



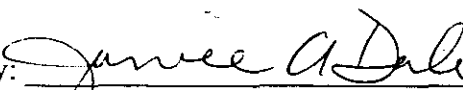
NOTARY PUBLIC



WHEREFORE, the Citizens Utility Board, the People of the State of Illinois, the Cook County State's Attorney's Office and the City of Chicago respectfully request that the Federal Communications Commission grant them leave to submit late-filed Initial Comments in the instant docket, CC. No. 99-200 through the Commission's Electronic Comment Filing System.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS  
James E. Ryan, Attorney General

By:   
Janice A. Dale  
Assistant Attorney General

**Dated: August 11, 1999**

struck with a heat wave and associated electric power outages, further delaying the work of our chief number pooling expert who was called upon to respond to the electric emergency in his capacity as Associate Director of the Citizens Utility Board.

5. In addition, unavoidable delays ensued when certain parties were out of town, further postponing the filing of the Comments.

6. In view of the Commission's special limited grant of number administration authority given to Illinois to implement IGCI's number pooling proposal in five Chicago area NPAs, as set forth in the FCC's *Pennsylvania Numbering Order* of September 28, 1998, we believe the Commission and interested parties would significantly benefit from an accounting of the Illinois experience with number conservation and number pooling.

6. If the FCC concludes that it is necessary to extend the filing date for Reply Comments to enable other parties adequate time to respond to our Comments, we have no objection.

7. This request to submit late-filed Initial Comments is not intended to delay these proceedings.

Proposed Rulemaking ("NOPR") in the above-entitled docket today, August 11, 1999.

1. On May 27, 1999, this Commission adopted its Notice of Proposed Rulemaking ("NOPR") in the instant docket, requesting comments on a large variety of issues associated with telephone number administration, the North American Numbering Plan and the current number exhaust crisis. The NOPR established a July 30, 1999 day for filing Initial Comments.

2. For almost two months, attorneys and experts working on behalf of IGCI have been preparing a comprehensive and detailed proposal for nationwide number optimization, based upon their successful implementation of number conservation and number pooling here in Illinois.

3. The Illinois Government and Consumer Intervenors are represented by a group of attorneys who are also representing their respective clients in the SBC-Ameritech merger proceedings currently before the Illinois Commerce Commission. In addition, at least one expert critical to the compilation of these Comments is the Associate Director of a utility consumer group active in matters involving the provision of electric service to residential customers in Illinois.

4. Despite their best efforts, the parties were unable to meet the July 30<sup>th</sup> deadline for the filing of Initial Comments. Only two days prior to this filing deadline, the attorneys preparing the comments were also filing briefs and proposed orders with the Illinois Commerce Commission in connection with the re-opening of evidentiary proceedings on the SBC-Ameritech merger (ICC Docket No. 98-0555). Just as those briefs were completed, Chicago was

**Before the**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, D.C. 20554**

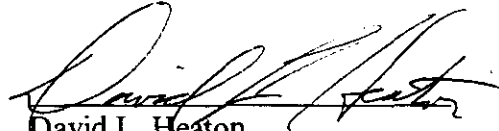
In the Matter of	)	
	)	CC Docket No. 99-200
Number Resource Optimization	)	
Connecticut Department of Public Utility Control	)	
Petition for Rulemaking to Amend the	)	RM No. 9258
Commission's Rule Prohibiting Technology-	)	
Specific or Service-Specific Area Code Overlays	)	
Massachusetts Department of Telecommunications	)	
and Energy Petition For Waiver to Implement A	)	NSD File No. L-99-17
Technology-Specific Overlay in the 508, 617, 781	)	
and 978 Area Codes	)	
California Public Utilities Commission and the	)	
People of the State of California Petition for )	)	
Waiver to Implement A Technology-Specific	)	NSD File No. L-99-36
or Service-Specific Area Code	)	

**MOTION FOR LEAVE TO SUBMIT LATE-FILED  
COMMENTS ON NOTICE OF PROPOSED RULEMAKING**

NOW COME the Citizens Utility Board, the People of the State of Illinois, ex rel. James E. Ryan, Attorney General of the State of Illinois, the Cook County State's Attorney's Office, Richard A. Devine, State's Attorney and the City of Chicago, by and through Mara S. Georges, Corporation Counsel (collectively, "Illinois Government and Consumer Intervenors" or "IGCI") and respectfully request that the Federal Communications Commission ("Commission") grant them leave to submit their late-filed Initial Comments in response to the Commission's Notice of

## CERTIFICATE OF SERVICE

I, DAVID L. HEATON, hereby certify that I caused copies of the foregoing Comments on Notice of Proposed Rulemaking of the Citizens Utility Board, the People of the State of Illinois, the Cook County State's Attorney's Office and the City of Chicago and the Motion for Leave to Submit Late-Filed Comments on Notice of Proposed Rulemaking of the Citizens Utility Board, the People of the State of Illinois, the Cook County State's Attorney's Office and the City of Chicago to be served upon Maggie Roman Salas, Secretary of the Federal Communications Commission, by overnight express mail, on August 11, 1999.

A handwritten signature in dark ink, appearing to read "David L. Heaton", is written over a horizontal line.

David L. Heaton

Assistant Corporation Counsel